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12 *Attorney for Defendants*

13 *Richard T. Warner, Jr. and Western Express Inc.*

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 TRACY NICHOLE TEOFRIO,

17 Plaintiff,

18 vs.

19 RICHARD T. WARNER, JR.; WESTERN
20 EXPRESS, INC., NAVISTAR LEASING
21 SERVICES CORPORATION; DOES I
22 through XX, inclusive and ROE BUSINESS
23 ENTITIES I through XX, inclusive,
24 Defendants.

CASE NO.: 2:15-cv-01747-JAD-GWF

ORDER

STIPULATION TO EXTEND BRIEFING

(First Request)

25 Pursuant to Local Rules ("LR") IA 6-1, Defendants, Richard T. Warner, Jr. ("Warner") and
26 Western Express, Inc. ("Western Express"), and Plaintiff, Tracy Nichole Teofrio ("Teofrio"), by and
27 through their respective attorneys, stipulate as follows:

28 1. On April 13, 2018, Warner and Western Express filed their motion for summary
judgment [ECF No. 54]. On May 4, 2018, Teofrio filed her response [ECF No. 58] and, on May 11,

1 2018, she filed a supplement to her response [ECF No. 62].

2 2. On May 7, 2018, Warner and Western Express filed their motion to preclude the opinions
3 and testimony of Plaintiff's expert, Paul Herbert [ECF No. 60].
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5 3. On May 11, 2018, Warner and Western Express filed their motion to preclude the
6 opinions and testimony of Plaintiff's expert, James Loong [ECF No. 61].

7 4. The parties previously requested and obtained an extension to file a reply to the motion
8 for summary judgment [ECF No. 54] and responses to the motions regarding experts Paul Herbert [ECF
9 No. 60] and James Loong [ECF No. 61]. *See* ECF No. 67 responses to all motions
10 because lead counsel for Warner and Western Express is out of the country from May 18, 2018 through
11 June 1, 2018.
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13 5. The parties require additional time to fully and meaningfully brief all of the factual and
14 legal issues raised in these three motions. In addition, Plaintiff filed a motion requesting a settlement
15 conference. ECF No. 69. The court gave Defendants until June 15, 2018 to respond to the motion. ECF
16 No. 70. Defendants' response to the requested settlement conference and the potential for the parties to
17 attend a settlement conference impacts the briefing on these three pending motions. As such, the parties
18 also request this extension so Defendants may consider the settlement conference request and how it
19 effects their pending motions.
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22 6. Therefore, the parties stipulate and agree that deadline for Warner and Western Express
23 to file and serve their reply to their motion for summary judgment [ECF No. 54] be extended to June 15,
24 2018.
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26 6. The parties further stipulate and agree that the deadline to file a response to Warner and
27 Western Express' motion to preclude the opinions and testimony of Plaintiff's expert, Paul Herbert [ECF
28 No. 60] should be extended to June 15, 2018.

1 7. The parties further stipulate and agree that the deadline to file a response to Warner and
2 Western Express' motion to preclude the opinions and testimony of Plaintiff's expert, James Loong
3 [ECF No. 61] should be extended to June 15, 2018.
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5 8. This is the second request for an extension of these deadlines and is not made for
6 purposes of delay.

7 DATED: June 8, 2018

DATED: June 8, 2018.

8 HALL JAFFE & CLAYTON, LLP

LADAH LAW FIRM

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Attorneys for Plaintiff, Tracy Nichole Teofrio

ORDER

15 IT IS SO ORDERED

16 Dated: June 11, 2018.

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20 UNITED STATES DISTRICT JUDGE
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